

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Kia L. Ragland a/k/a Kia L. Birch a/k/a
Kia L. Waters a/k/a Kia L. Robinson a/k/a
Kia L. Fleming
Debtor

American Heritage Federal Credit Union,
Movant,

v.

Kia L. Ragland a/k/a Kia L. Birch a/k/a Kia
L. Waters a/k/a Kia L. Robinson a/k/a Kia L.
Fleming,
Respondent/Debtor,
and
Scott Waterman, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
20-14312/AMC

**OBJECTION OF AMERICAN HERITAGE FEDERAL CREDIT UNION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

American Heritage Federal Credit Union, by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about October 30, 2020, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 1933 Church Lane, Philadelphia, PA 19141.
3. On or about December 17, 2020, Movant filed a Proof of Claim citing arrears in the amount of \$10,259.78, and a total claim in the amount of \$68,920.27.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$6,600.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.

8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, American Heritage Federal Credit Union respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: January 8, 2021

S&D File #:20-064945

BY: /s/ Christopher A. DeNardo
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CERTIFICATE OF SERVICE

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal LLP hereby certify that I caused to be served true and correct copies of American Heritage Federal Credit Union's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on January 8, 2021:

Kia L. Ragland a/k/a Kia L. Birch a/k/a Kia L. Waters a/k/a Kia L. Robinson a/k/a Kia L.
Fleming
1933 Church Lane
Philadelphia, PA 19141

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Sent via electronic notification brad@sadeklaw.com

Scott Waterman, Trustee
Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606
Sent via electronic notification ecfmail@fredreiglech13.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Christopher A. DeNardo

LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800

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Philadelphia, PA 19141